

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CYBERFONE SYSTEMS, LLC (formerly)	
known as LVL PATENT GROUP, LLC),)	
)	
Plaintiff,)	
)	C.A. No. 11-827 (SLR)
v.)	
)	
CELLCO PARTNERSHIP; AT&T)	
MOBILITY, LLC; SPRINT SPECTRUM L.P.;)	
T-MOBILE USA, INC.; CRICKET)	
COMMUNICATIONS, INC.; VIRGIN)	
MOBILE USA, L.P.; UNITED STATES)	
CELLULAR CORPORATION; METROPCS)	
WIRELESS, INC.; TRACFONE WIRELESS,)	
INC.; BOOST MOBILE, LLC; APPLE, INC.;)	
RESEARCH IN MOTION CORPORATION;)	
NOKIA INC.; SAMSUNG)	
TELECOMMUNICATIONS AMERICA,)	
INC.; MOTOROLA MOBILITY, INC.; HTC)	
AMERICA, INC.; SHARP ELECTRONICS)	
CORPORATION; PANTECH WIRELESS,)	
INC.; LG ELECTRONICS MOBILECOMM)	
U.S.A., INC.; HEWLETT-PACKARD)	
COMPANY; SONY ERICSSON MOBILE)	
COMMUNICATIONS (USA), INC.; CASIO)	
AMERICA, INC.; FUTUREWEI)	
TECHNOLOGIES, INC.; ZTE (USA) INC.;)	
AND KYOCERA WIRELESS CORP,)	
)	
Defendants.)	

**DEFENDANT VIRGIN MOBILE USA, L.P.'S JOINDER IN
THE MOVING WIRELESS CARRIERS' MOTION TO STAY**

Defendant Virgin Mobile USA, L.P. ("Virgin Mobile") hereby joins in the Moving Wireless Carriers' Motion to Stay ("Motion to Stay") (D.I. 99), filed on December 20, 2011. As noted in the Opening and Reply Briefs in support of the Motion to Stay (D.I. 100, 142), Virgin Mobile is a reseller of mobile handset devices, and the case against it should be stayed pursuant to the customer suit exception. Virgin Mobile has conferred with counsel for

Plaintiff, and Plaintiff does not oppose this joinder based on its timeliness, but reserves its rights regarding the merits of the Motion, which it has already opposed (D.I. 136). Therefore, for the reasons set forth in the Opening and Reply Briefs, Virgin Mobile requests that the Court stay the action as to it pending the resolution of the suit against the so-called “Wireless Handset Manufacturers.”

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Paul Saindon

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